

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF VERMONT

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JOHNNY HA, JENNY PHAM a/k/a )  
JENNY HA, and HELEN LE, )  
 )  
 *Plaintiffs,* )  
 )  
 v. )  
 )  
 TINA CONN, )  
 )  
 *Defendant.* )  
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Civil Action No. 2:20-cv-155-wks

**NOTICE OF PLAINTIFFS' MOTION FOR A PREJUDGMENT  
WRIT OF ATTACHMENT AGAINST DEFENDANT TINA CONN**

**PLEASE TAKE NOTICE** that, upon the accompanying Declarations of Plaintiffs Johnny Ha, Jenny Pham and Helen Le, the Declaration of Plaintiffs' undersigned counsel Daniel A. Seff, the accompanying Memorandum of Law, and upon all the pleadings and proceedings heretofore had herein, Plaintiffs Johnny Ha, Jenny Pham (a/k/a Jenny Ha) and Helen Le (collectively, "Plaintiffs") hereby move this Court pursuant to Federal Rule of Civil Procedure 64, 12 V. S. A. § 3295 and Rule 4.1 of the Vermont Rules of Civil Procedure for an Order of Approval granting a Prejudgment Writ of Attachment in the amount of \$450,000.00 against Defendant Tina Conn, and for such other and further relief as to this Court may seem just and proper.

A proposed Writ of Attachment and Order of Approval is attached as an Exhibit to the accompanying Declaration of Daniel A. Seff.

Dated: May 3, 2022  
Burlington, Vermont

Respectfully submitted,

MSK ATTORNEYS

By: /s/ Daniel A. Seff  
Daniel A. Seff

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